## LEE SHEIKH MEGLEY & HAAI

111 West Jackson Boulevard, Suite 2230 Chicago, Illinois 60604

(312) 982-0070

www.leesheikh.com

alavalley@leesheikh.com

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DATE FILED:

Ashley E. LaValley Direct Dial: (312) 982-0068

November 12, 2020

The Honorable Colleen McMahon United States District Court, Southern District of New York 500 Pearl Street New York, NY 10007-1312

Civil Action N

Re:

Perry Street Software, Inc. v. Jedi Technologies, Inc. Civil Action No. 1:20-cv-04539(CM)

Dear Judge McMahon:

Jedi Technologies, Inc. ("Jedi") hereby makes application to this Court that certain information be filed and maintained under seal.

Contemporaneously with this letter, Jedi filed its Notice Of Submission Of Deposition Transcript Of Brian Haan In Support Of Defendant Jedi Technologies, Inc.'s Motion For A Permanent Injunction Enjoining Or Staying Arbitration, as well as a redacted transcript of the November 6, 2020 deposition of Brian E. Haan. Docket No. 60.

The deposition transcript is redacted in part at pages 30-31 to protect personally identifiable information of Mr. Haan, specifically, a list of his personal email addresses, which have been designated *Confidential* under the Stipulation and Confidentiality Order, Docket No. 59.

Jedi makes application to this Court to seal the unredacted copy of the transcript of the November 6, 2020 deposition of Brian E. Haan, filed herewith pursuant to the Court's Individual Practices and Procedures, Section V.A. Sealing of this unredacted document is necessary because it constitutes personally identifiable information of Mr. Haan, the disclosure of which could be used to electronically hack, harass or otherwise harm Mr. Haan and, as such, is designated *Confidential* under the Stipulation and Confidentiality Order, Docket No. 59.

Accordingly, Jedi respectfully requests that the Court grant Jedi's request to seal an unredacted copy of the transcript of the November 6, 2020 deposition of Brian E. Haan.

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Respectfully submitted,

Ashley E. LaValley

Attorney for Defendant-Counterclaim Plaintiff Jedi Technologies, Inc.

AEL\ck

cc: All Counsel of Record (by ECF)